



Shapiro Arato Bach LLP

1140 Avenue of the Americas, 17th Floor, New York, NY 10036  
phone: 212-257-4880  
[www.shapiroarato.com](http://www.shapiroarato.com)

Alexandra A.E. Shapiro  
[ashapiro@shapiroarato.com](mailto:ashapiro@shapiroarato.com)  
Direct: 212-257-4881

March 17, 2025

**VIA ECF**

Hon. Arun Subramanian  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Combs*, 24-cr-542 (AS)

Dear Judge Subramanian:

Pursuant to the Court's Individual Rules, we submit this letter on behalf of both parties to respectfully request that the Court permit both parties to file oversized principal briefs, of up to 30 pages, in connection with Sean Combs's forthcoming motion to preclude the government's Rule 413/404(b) evidence. Mr. Combs's opening memorandum is due March 19, 2025, and the government's opposition is due March 26, 2025. The government consents to this request.

Respectfully submitted,

/s/ Alexandra A.E. Shapiro

Alexandra A.E. Shapiro  
Jason A. Driscoll  
SHAPIRO ARATO BACH LLP  
1140 Avenue of the Americas, 17th Fl.  
New York, NY 10036  
(212) 257-4880  
[ashapiro@shapiroarato.com](mailto:ashapiro@shapiroarato.com)  
[jdriscoll@shapiroarato.com](mailto:jdriscoll@shapiroarato.com)

Marc Agnifilo  
Teny Geragos  
AGNIFILO INTRATER  
445 Park Ave., 7th Fl.  
New York, NY 10022  
646-205-4350  
[marc@agilawgroup.com](mailto:marc@agilawgroup.com)  
[teny@agilawgroup.com](mailto:teny@agilawgroup.com)

Hon. Arun Subramanian  
March 17, 2025

Anna Estevao  
SHER TREMONTE LLP  
90 Broad St., 23rd Fl.  
New York, NY 10004  
(212) 202-2600  
[aestevao@shertremonte.com](mailto:aestevao@shertremonte.com)